HERBERT SMITH FREEHILLS **NEW YORK LLP** Marc J. Gottridge Michael Schoeneberger 450 Lexington Avenue New York, New York 10017 Telephone: (917) 542-7600 marc.gottridge@hsf.com michael.schoeneberger@hsf.com

Hearing Date: June 15, 2022 Opposition Date: April 26, 2022 Reply Date: May 26, 2022

Attorneys for the Defendants in Adversary Proceeding No. 11-02569 (CGM)

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (CGM)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

BARCLAYS BANK (SUISSE) S.A., CAIXABANK S.A., as successor by merger to Barclays Bank S.A., and ZEDRA TRUST COMPANY (JERSEY) LIMITED (f/k/a Barclays Private Bank & Trust Limited),

Defendants.

(Substantively Consolidated)

Adv. Pro. No. 11-02569 (CGM)

ORAL ARGUMENT REQUESTED

NOTICE OF HEARING ON THE BARCLAYS DEFENDANTS' MOTION TO DISMISS THE COMPLAINT PLEASE TAKE NOTICE that on February 25, 2022, defendants Barclays Bank (Suisse) S.A., Caixabank S.A., as successor by merger to Barclays Bank S.A., and Zedra Trust Company (Jersey) Limited (f/k/a Barclays Private Bank & Trust Limited) (together, the "Barclays Defendants"), filed their Motion to Dismiss the Complaint in the above-captioned action pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012(b) of the Federal Rules of Bankruptcy Procedure (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on June 15, 2022 at 10:00 a.m. (prevailing Eastern time) before the Honorable Cecelia G. Morris, Chief Judge of the United States Bankruptcy Court for the Southern District of New York (the "Court"), either in person at a location to be designated by the Court or via Zoom. If the hearing is held via Zoom, persons wishing to participate in the hearing must register their appearance utilizing the eCourt Appearances portal available on the Court's website, and appearances must be entered no later than 4:00 p.m. prevailing Eastern time on the day before the hearing.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order entered on December 16, 2021 (ECF No. 121), all papers responsive to the Barclays Defendants' Motion to Dismiss the Complaint shall be served and filed no later than April 26, 2022, and all reply papers in further support of the Barclays Defendants' Motion to Dismiss the Complaint shall be served and filed no later than May 26, 2022.

Dated: New York, New York February 25, 2022

HERBERT SMITH FREEHILLS NEW YORK LLP

By: /s/ Marc J. Gottridge

Marc J. Gottridge
Michael Schoeneberger
450 Lexington Avenue
New York, New York 10017
Telephone: (917) 542-7600
marc.gottridge@hsf.com

michael.schoeneberger@hsf.com

Attorneys for Defendants Barclays Bank (Suisse) S.A., Caixabank S.A., as successor by merger to Barclays Bank S.A., and Zedra Trust Company (Jersey) Limited (f/k/a Barclays Private Bank and Trust Limited)